

In Docket HM-215E, the FL DEP Bureau of Emergency Response agrees with the proposal to require the inclusion of subsidiary hazard on the shipping paper, and with identifying on the shipping paper the types and number of each package. Both will improve the detail of information on the shipping paper.

However, we saw one item with which we do not agree. DOT proposes, in 49 CFR 172.301(a)(1) and the new 172.315, to allow Ltd Qty packages to NOT be marked with the proper shipping name. Only the UN ID# would be required. We believe that all packages should have the proper shipping name, so that a person can easily and quickly determine the contents. The ID# requires a person to look it up in a book (which may or may not be handy). And, some ID#s apply to more than one chemical, or merely reference a generic shipping description that will lack the specific ingredients. We do not believe that it is a burden to simply mark the PSN on a package, including Ltd Qty packages.